

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

JUSTIN TRUDEAU,

Plaintiff,

vs.

UNIVERSITY OF NORTH TEXAS, By and  
Through its Board of Regents,

Defendant.

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**Civil Action No. 4:19-cv-00723**

**PLAINTIFF’S UNOPPOSED FIRST MOTION TO EXTEND THE DEADLINE  
TO FILE PLAINTIFF’S RESPONSE TO DEFENDANTS’  
MOTION TO DISMISS PLAINTIFF’S FIRST AMENDED COMPLAINT**

Plaintiff files this Unopposed Motion to Extend the Deadline to File Plaintiff’s Response to Defendant’s to Dismiss Plaintiff’s First Amended Complaint [Document 24].

1. On February 26, 2020, Defendants filed a motion for dismiss. Plaintiff’s due date to respond to said motion is on March 12, 2020. Plaintiff respectfully request that the Court extend Plaintiff’s deadline to respond for no more than seven (7) days or until **March 19, 2020**.

2. Plaintiff relies on the following main reasons to explain the need for the requested extension: over the past weeks, among other things, counsel for Plaintiff, Michael P. Kelly, who is a sole practitioner, has been responsible for handling several other matters since the February 26<sup>th</sup> filing by Defendants, including preparation for trial, attending depositions, and had other responsibilities which required his time. As the result, Plaintiff will be unable—given length of the brief, the number of points briefed and issues presented by Defendants in the motion—to adequately prepare the response and will not be able to meet the current deadline.

3. The undersigned has conferred with Matthew Bohuslav and Role Daaboul, Counsel for Defendant or about March 11, 2020, and discussed with him the merits of the Motion. Counsel are opposed to the extension. Plaintiff has provided a certificate of conference below.

4. Plaintiff's request to extend time is for good cause and is not intended to delay these proceedings. Such extension will allow Plaintiff to properly brief the Court in a clear and concise manner.

#### REQUEST FOR RELIEF

Plaintiff ask that the Court extend Plaintiff's deadline to file a Plaintiff's Response to Defendants' Motion to Dismiss Plaintiff's Amended Complaint until March 19, 2020, and for all other relief to which he may be entitled.

DATED: March 11, 2020.

Respectfully submitted,

/s/ Michael P. Kelly

Michael P. Kelly

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COUNSEL FOR PLAINTIFF

## CERTIFICATE OF SERVICE

On March 11, 2020, this document was served on Matthew Bohuslav and Role Daaboul, Assistant Attorney General, State of Texas, counsel for Defendants, by its electronic filing, as is required.

/S/ MICHAEL P. KELLY  
Michael P. Kelly

# CERTIFICATE OF CONFERENCE

The undersigned certifies that on March 11, 2020 he conferred with Counsel for Defendants, Matthew Bohuslav and Rola Daaboul, regarding this motion and the request for additional time. They both indicated that they are unopposed to the motion.

/S/ MICHAEL P. KELLY  
Michael P. Kelly